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AND

CLARK COUNTY SCHOOL DISTRICT
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Attorneys for DEFENDANTS
Clark County School District and Board of
Trustees of the Clark County School District

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SARA QUINTANA,

Plaintiff,

vs.

CLARK COUNTY SCHOOL DISTRICT, a
political subdivision of the State of Nevada;
and the BOARD OF TRUSTEES OF THE
CLARK COUNTY SCHOOL DISTRICT,
in their official capacities,

Defendants.

CASE NO. 2:21-cv-00023-CDS-MDC

**STIPULATION AND ORDER
TO EXTEND JOINT PRETRIAL
ORDER DEADLINE TO 60 DAYS
AFTER SETTLEMENT
CONFERENCE
(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED by Defendants CLARK COUNTY
SCHOOL DISTRICT (CCSD) and the BOARD OF TRUSTEES OF THE CLARK COUNTY

SCHOOL DISTRICT (BOT) through their attorneys STEPHANIE A. BARKER, ESQ. of the law firm of OLSON CANNON & GORMLEY, and CRYSTAL J. PUGH, ESQ. of the OFFICE OF THE GENERAL COUNSEL FOR THE CLARK COUNTY SCHOOL DISTRICT; and by Plaintiff SARA QUINTANA through her attorneys JAMES P. KEMP, ESQ. of the law firm KEMP & KEMP, and JAMES A. HILL, ESQ. of the law firm GILBERT EMPLOYMENT LAW, P.C., that:

IN CONSIDERATION OF THE FOLLOWING:

1. On February 21, 2024, pursuant to the Court's Order (ECF 62) Granting in Part and Denying in Part Defendants' Motion for Summary Judgment, pursuant to LR 16-5 this case was referred to the Magistrate Judge for a settlement conference. The Order also directed that if the case did not settle, the parties must file their joint pretrial order 30 days after the conclusion of the settlement conference. ECF 62, p. 23.
2. A settlement conference was originally scheduled for June 18, 2024 (ECF 63) but did not proceed following Magistrate Judge Koppe's recusal on June 13, 2024 (ECF 64). Following reassignment to Magistrate Judge Albregts and resetting of the settlement conference to July 19, 2024 (ECF 65), a single extension of time was granted to accommodate Plaintiff's counsels' schedules and the settlement conference was re-scheduled for and held on November 4, 2024. (ECF 83).
3. The settlement conference was not successful. (Minute Order November 4, 2024).
4. In light of the Court's Order (ECF 62) on Defendants' Motion for Summary Judgment, the parties have significantly differing views regarding how trial should proceed and the length of time necessary to complete the trial, which differences will require significant discussion between the parties in compliance with LR 16-3(b) in order to come to agreement on a Joint Pretrial Order.
5. Defense counsel Stephanie A. Barker, Esq., will be out of the office and out of the country on a pre-scheduled vacation between November 22 and December 11, 2024.
6. In light of defense counsel's schedule, and scheduling conflicts created by the upcoming holiday season, the parties hereby stipulate and request extension of the

1 deadline for the Joint Pretrial Order for an additional 30 days, making the Joint Pretrial
2 Order due to the Court on or before January 3, 2025.

3 7. This is the parties' first Stipulation to Extend the Joint Pretrial Order deadline.

4 NOW THEREFORE, THE PARTIES HEREBY STIPULATE that deadline to file the
5 Joint Pretrial Order be extended for an additional 30 days to January 3, 2025.

6 RESPECTFULLY SUBMITTED.

7 DATED this 20th day of Nov., 2024.

DATED this 20th day of Nov., 2024.

8 KEMP & KEMP

OLSON CANNON & GORMLEY

9 /s/ James P. Kemp

/s/ Stephanie A. Barker

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20 *Attorneys for Plaintiff*
21 *Sara Quintana*

Attorneys for Defendants
Clark County School District and Board of
Trustees of the Clark County School District

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24 **IT IS SO ORDERED.**

25 DATED: 11-20-24

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27 UNITED STATES MAGISTRATE JUDGE
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